

# Exhibit 19

1 JENNIFER JEHN

2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK

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4 SANDRA GUZMAN,

5 Plaintiff,

6 -against- 09CIV9323 (BSJ) (RLE)

7 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a  
8 THE NEW YORK POST, and COL ALLAN, in his  
9 official and individual capacities,

10

Defendants.

-----X

11 AUSTIN FENNER and IKIMULISA LIVINGSTON,

12

13 Plaintiffs,

14 -against- 09CIV9832 (BSJ) (RLE)

15 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a  
16 THE NEW YORK POST and DAN GREENFIELD and  
17 MICHELLE GOTTHELF,

18 Defendants.

-----X

19

20

21 VIDEOTAPED DEPOSITION OF JENNIFER JEHN

22 New York, New York

23 Tuesday, June 26, 2012

24

25 REPORTED BY: BARBARA R. ZELTMAN

(BOBBIE)

Professional Stenographic Reporter

26

27 Job Number: 51052

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1 JENNIFER JEHN  
 2 And did Amy do that? Did she look  
 3 at other options?  
 4 MR. LERNER: Objection.  
 5 A I believe she did.  
 6 Q Did you speak to any other editor  
 7 at The New York Post about the possibility  
 8 of transferring Sandra Guzman to another  
 9 job?  
 10 A I did not.  
 11 Q Did you ever speak to Paul Carlucci  
 12 about the possibility of transferring Sandra  
 13 Guzman to another job?  
 14 A I did not.  
 15 Q Other than Amy, did you speak to  
 16 anyone else at all about the possibility of  
 17 transferring Ms. Guzman to another job?  
 18 A I didn't.  
 19 Q Did you ever tell Col Allan that  
 20 Sandra Guzman had complained about the  
 21 cartoon in February?  
 22 A Yes.  
 23 Q When did you tell Col Allan that?  
 24 A Around after the cartoon.  
 25 Q In February 2009?

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1 JENNIFER JEHN  
 2 Q Did you name other employees in  
 3 addition to Sandra Guzman?  
 4 A I don't recall.  
 5 Q So as you sit here today, the only  
 6 employee you can recall specifically  
 7 speaking to Col Allan about in reference to  
 8 the cartoon was Sandra Guzman?  
 9 A Yes.  
 10 Q And what was Col Allan's reaction?  
 11 A He said "Okay" and "Thank you."  
 12 Q That's it?  
 13 A Yes.  
 14 Q Why did you tell Col Allan about  
 15 this situation with Sandra Guzman?  
 16 MR. LERNER: Objection.  
 17 A I told Col Allan about Sandra being  
 18 upset about the content of the cartoon  
 19 because she was upset.  
 20 Q I don't follow. Why did you tell  
 21 Col Allan that?  
 22 A I told Col because Sandra was more  
 23 upset.  
 24 Q I'm sorry. I'm just not following  
 25 you.

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1 JENNIFER JEHN  
 2 A Yes.  
 3 Q How soon after the cartoon was  
 4 published do you think you had the  
 5 conversation?  
 6 A Within a couple days.  
 7 Q And what did you tell Col Allan  
 8 about Sandra Guzman's complaint?  
 9 A I told Col Allan that Sandra  
 10 complained about the content of the cartoon  
 11 being published.  
 12 Q And did you speak to Col Allan in  
 13 person?  
 14 A No.  
 15 Q Did you speak to him over the  
 16 phone?  
 17 A Yes.  
 18 Q Did he call you or did you call  
 19 him?  
 20 A I don't recall.  
 21 Q Do you recall anything else you  
 22 told Col Allan about Sandra Guzman's  
 23 complaint?  
 24 A I told Col Allan that employees  
 25 were upset about the content of the cartoon.

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1 JENNIFER JEHN  
 2 What was your reasoning that you  
 3 thought that you should tell Col Allan as  
 4 opposed to everyone else at the paper?  
 5 MR. LERNER: Objection.  
 6 A I told Col Allan because he was/is  
 7 the editor of The New York Post.  
 8 Q Do you think that he would want to  
 9 know about Sandra Guzman complaining about  
 10 the cartoon?  
 11 A Yes.  
 12 Q Why do you think he would want to  
 13 know about it?  
 14 A I think he would want to know about  
 15 employees complaining about the content of  
 16 the cartoon and I think he would want to  
 17 know about Sandra complaining about the  
 18 cartoon.  
 19 Q And specifically why would he want  
 20 to know about Sandra complaining about the  
 21 cartoon?  
 22 MR. LERNER: Objection.  
 23 Q If you know.  
 24 A I don't know specifically why he  
 25 would want to know. I don't know --

1  
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3 SOUTHERN DISTRICT OF NEW YORK

4 SANDRA GUZMAN, )  
5 )  
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24 INC., d/b/a THE NEW YORK POST )  
25 and DAN GREENFIELD and )  
MICHELLE GOTTHELF, )  
Defendants. )  
-----)

19 CONTINUED  
20 DEPOSITION OF JENNIFER JEHN  
21 New York, New York  
22 Thursday, February 14, 2013  
23

24 Reported by:  
25 FRANCIS X. FREDERICK, CSR, RPR, RMR  
JOB NO. 57921

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1 J. JEHN  
2 work performance or, you know, not her  
3 supervisor. So I would be speculating on if  
4 she was passionate.  
5 Q. At any time did you observe Ms.  
6 Guzman in the carrying out of her job duties?  
7 A. No.  
8 Q. Did you ever review any of Ms.  
9 Guzman's work product, whether in a  
10 professional capacity or just as a reader?  
11 MR. LERNER: By review it do you  
12 mean critically review it or see it?  
13 MR. PEARSON: See it.  
14 A. Yes. I've seen the Tempo section  
15 in the paper.  
16 Q. Okay. And what was your opinion  
17 of the content of Tempo?  
18 A. My opinion of the Tempo content is  
19 that it was good.  
20 Q. Did Ms. Guzman work on other  
21 sections of the paper other than Tempo?  
22 A. I don't recall.  
23 Q. Was Ms. Guzman involuntarily  
24 terminated from her work at The New York Post?  
25 A. I don't understand what you mean

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1 J. JEHN  
2 A. I don't --  
3 MR. LERNER: Ever?  
4 Q. At the time that the  
5 termination -- at the time that the decision  
6 was made to eliminate her position, was she  
7 considered for transfer to any other position?  
8 A. I directed my VP of Human  
9 Resources at the time, Amy Scialdone, yes, to  
10 look at options, other options for Ms. Guzman  
11 for other options for work.  
12 Q. And what options, if any, were  
13 considered?  
14 A. I don't recall.  
15 Q. Did you discuss that search for  
16 other options with Amy at any point?  
17 A. I did not in detail. She reported  
18 back to me that there weren't any other  
19 positions available.  
20 MR. LERNER: One second.  
21 (Conference between counsel and  
22 witness.)  
23 Q. And did Ms. Scialdone tell you the  
24 process that she had gone through to determine  
25 that there were no other positions available?

1 J. JEHN  
2 by involuntary.  
3 Q. Well, did Ms. Guzman at some point  
4 depart her employment at The New York Post?  
5 A. The section that Ms. Guzman was  
6 working on, Tempo, a business decision was  
7 made that that section was going to no longer  
8 be a monthly section because it wasn't  
9 profitable or the revenue picture was not --  
10 did not look good. And as a result of that  
11 Ms. Guzman's position was eliminated.  
12 Q. And Ms. Guzman's employment at The  
13 New York Post ended as a result of that?  
14 A. Well, the business decision was  
15 made that the Tempo section was going to no  
16 longer publish at the same frequency that it  
17 was currently being published at. And as a  
18 result of that her -- the position of Tempo  
19 editor was eliminated.  
20 Q. And as a result she was no longer  
21 an employee of The Post; is that right?  
22 A. Yes.  
23 Q. Was Ms. Guzman ever considered for  
24 another position with The Post?  
25 MR. LERNER: Objection.

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1 J. JEHN  
2 A. I don't recall.  
3 Q. How was the elimination of Ms.  
4 Guzman's position communicated to her, if it  
5 ever was?  
6 A. I don't recall.  
7 Q. Was Tempo the only section of the  
8 paper that had a poor revenue picture at the  
9 time of Ms. Guzman's departure from The New  
10 York Post?  
11 MR. LERNER: Objection.  
12 A. I don't recall.  
13 Q. Was any part of Ms. Guzman's job  
14 duties at The New York Post around the time of  
15 her purported job elimination the selling of  
16 ads for any section of the paper?  
17 MR. LERNER: Objection.  
18 A. I don't understand what you're  
19 asking me.  
20 Q. Sure. At any point during Ms.  
21 Guzman's employment with The Post was she  
22 responsible for selling advertisements for the  
23 paper?  
24 MR. LERNER: Objection.  
25 A. I don't -- I don't -- I don't

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1 J. JEHN  
2 recall.  
3 Q. So at the time of her departure  
4 from The New York Post, was she in any  
5 capacity responsible for selling  
6 advertisements in the paper?  
7 A. I don't believe so.  
8 Q. Did any employee of The New York  
9 Post inquire with you about the reason for Ms.  
10 Guzman's termination?  
11 A. No.  
12 Q. Did any employee of The New York  
13 Post inquire with any other HR or Legal  
14 personnel at The New York Post about Ms.  
15 Guzman's termination?  
16 MR. LERNER: Objection.  
17 A. Can you repeat that question?  
18 Q. Sure. Did any other The New York  
19 Post employee, apart from counsel, inquire  
20 with you about the reason for Ms. Guzman's  
21 termination?  
22 A. What do you mean --  
23 MR. LERNER: Okay. Hold on. That  
24 was the same question as two questions  
25 ago. She asked you to restate the

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1 J. JEHN  
2 Q. Did you or any other member of New  
3 York Post's -- of The New York Post's Human  
4 Resources personnel speak to any member of the  
5 media concerning Ms. Guzman's termination?  
6 MR. LERNER: Objection.  
7 A. No.  
8 Q. Did The New York Post continue to  
9 publish Tempo following Ms. Guzman's departure  
10 from The Post?  
11 A. No.  
12 Q. Had the decision to cancel Tempo  
13 entirely been made at the time of Ms. Guzman's  
14 departure from the paper?  
15 MR. LERNER: Objection.  
16 A. At the time of Ms. Guzman's  
17 departure there was a recommendation that the  
18 frequency of the Tempo section would be --  
19 most likely be reduced.  
20 Q. So it had been decided it would be  
21 reduced but not eliminated entirely; is that  
22 correct, my understanding?  
23 MR. LERNER: Objection.  
24 A. It was recommended that it would  
25 be reduced in frequency.

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1 J. JEHN  
2 question. I think you asked a different  
3 question.  
4 MR. PEARSON: My understanding is  
5 that this should be a church mouse  
6 situation. If you have an objection,  
7 state the objection. This is a continued  
8 deposition. We're covering a lot of  
9 material.  
10 BY MR. PEARSON:  
11 Q. Following Ms. Guzman's departure  
12 from The Post, did any The New York Post  
13 employee, apart from counsel or anyone  
14 involved in the instant lawsuit, inquire with  
15 you about the reason for Ms. Guzman's  
16 termination?  
17 A. No.  
18 MR. LERNER: Objection.  
19 A. No.  
20 Q. Did anyone inquire about such  
21 matters with any other member of Human  
22 Resources, to your knowledge?  
23 MR. LERNER: Objection.  
24 Q. Following Ms. Guzman's departure.  
25 A. To my knowledge, no.

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1 J. JEHN  
2 Q. And was a decision made at any  
3 point to cancel Tempo entirely and stop  
4 publishing it at The Post?  
5 A. I was no longer at The Post a few  
6 months after that so I don't have any  
7 knowledge of that. But I do know that the  
8 section was not published.  
9 Q. Okay. Were you present in any  
10 meeting in which Ms. Guzman was informed that  
11 she would no longer be working at The New York  
12 Post?  
13 A. No.  
14 Q. Did you discuss any such meeting  
15 with Ms. Guzman with any other employee of The  
16 New York Post?  
17 A. Could you repeat that question,  
18 please?  
19 Q. Sure. Did you discuss any meeting  
20 with Ms. Guzman about her departure from The  
21 Post with anyone else?  
22 MR. LERNER: I'm going to object  
23 to the form but you can answer it.  
24 A. It's possible I may have discussed  
25 that with Amy Scialdone.